

### REMARKS

The Official Action mailed January 11, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statement filed on October 16, 2003.

The Applicant notes the partial consideration of the Information Disclosure Statement filed on September 29, 2003. Specifically, it appears that the Examiner inadvertently overlooked the citation of JP 07-121144. A copy of the partially considered Form PTO-1449 appears in the Image File Wrapper under the heading "List of References cited by applicant and considered by examiner" with a Mail Room Date of July 5, 2005. The Applicant respectfully requests that the Examiner provide an initialed copy of the Form PTO-1449 evidencing consideration of JP 07-121144.

A further Information Disclosure Statement was submitted on January 12, 2006 (received by OIPE January 17, 2006), and consideration of this Information Disclosure Statement is respectfully requested.

The Applicant again respectfully requests correction of the Pre-Grant Publication of the present application, which is U.S. Patent Application Publication No. 2004/0095304. The abstract, specification and original claims published in the '304 publication do not correspond with the abstract, specification and original claims of the present application. It appears that the title, inventor's name, correspondence address, assignee, application number, filing date, domestic and foreign priority date, etc. are correct as published in the '304 publication. The Applicant notes that the abstract, specification and original claims as shown in the Image File Wrapper for the present application are correct. As such, it appears that the Patent Office improperly matched information (the title, inventor's name, correspondence address, assignee, application number, filing date, domestic and foreign priority date, etc.) from the present application

with the abstract, specification and original claims of another application. Therefore, the Applicant respectfully requests that the '304 publication be rescinded and republished so that it contains the abstract, specification and original claims of the present application as shown in the Image File Wrapper.

Claims 1-19 are pending in the present application, of which claims 1-4, 8 and 11 are independent. Independent claims 1-4 have been amended to better recite the features of the present invention, and dependent claims 17-19 have been amended to correct a minor typographical informality. The Applicant notes with appreciation the allowance of claims 11, 12 and 19 and the indication of the allowability of claims 13-18 (page 11, Official Action mailed 01/11/2006). For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 1-4 as obvious based on the combination of U.S. Patent No. 5,847,688 to Ohi et al. and U.S. Patent No. 5,049,998 to Lee. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

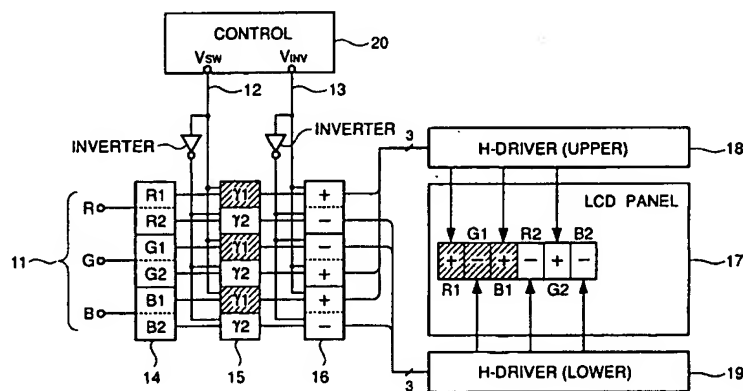
As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole

would have suggested to those of ordinary skill in the art.” In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claims 1-4 recite inputting a pair of video signals to one source driver circuit. The Official Action appears to assert that “two video signals going to H-driver (upper) and H-driver (lower)” in Figure 6 correspond with “inputting the pair of video signals to one source driver circuit” (page 3, Official Action mailed 01/11/2006). The Applicant respectfully disagrees and traverses the above-referenced assertions in the Official Action.

Ohi appears to teach that “gamma converted signals outputted from the six gamma conversion circuits 15 are fed through six inverting circuits 16 to upper and lower horizontal drivers 18 and 19” (column 5, lines 58-60). That is, the signals are inputted into two different drivers.

FIGURE 6



Ohi does not teach inputting a pair of video signals to one source driver circuit or applying first and second video signals to a source driver circuit, either explicitly or inherently. Further, Ohi does not teach or suggest that upper H-driver 18 and lower H-driver 19 could or should be replaced with one source driver circuit.

Lee does not cure the deficiencies in Ohi. Lee is relied upon to allegedly teach “decimation means for separating said input video signal into two separate signals” and “for sampling said first one of said two separate signals for outputting a first sampled signal and for sampling said second one of said two separate signals for outputting a second sampled signal, said two separate signals also being provided as outputs of said decimation means” (page 3, Official Action mailed 01/11/2006). However, Ohi and Lee, either alone or in combination, do not teach or suggest that upper H-driver 18 and lower H-driver 19 could or should be replaced with one source driver circuit. Therefore, Ohi and Lee do not teach or suggest inputting a pair of video signals to one source driver circuit.

Also, the Official Action concedes that Ohi does not teach “applying one of the pair of video signals to an odd signal line of the signal lines of the pixel region and applying the other of the pair of video signals to an even signal line of the signal lines of a pixel region” (Id.). The Official Action asserts that Lee cures this deficiency in Ohi. The Applicant respectfully disagrees and traverses the above-referenced assertion in the Official Action. The Official Action appears to imply a correspondence between Lee’s teaching of a decimation means and a teaching that one of a pair of video signals should be applied to an odd signal line of signal lines of a pixel region; and that the other of the pair of video signals should be applied to an even signal line of the signal lines of the pixel region. The Official Action has not supported this implied correspondence.

Since Ohi and Lee do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Furthermore, there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Ohi and Lee or to combine reference teachings to achieve the claimed invention. MPEP § 2142 states that the examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. It is respectfully submitted that the Official Action has failed to carry this burden. While the Official Action relies on various

teachings of the cited prior art to disclose aspects of the claimed invention and asserts that these aspects could be used together, it is submitted that the Official Action does not adequately set forth why one of skill in the art would combine the references to achieve the features of the present invention.

The test for obviousness is not whether the references "could have been" combined or modified as asserted in the Official Action, but rather whether the references should have been. As noted in MPEP § 2143.01, "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." In re Mills, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) (emphasis in original). Thus, it is respectfully submitted that the standard set forth in the Official Action is improper to support a finding of *prima facie* obviousness.

As noted in detail above, the Official Action concedes that Ohi does not teach applying two pairs of video signals to odd and even signal lines of a pixel region and asserts that Lee's decimation means cures these deficiencies in Ohi (page 3, Official Action mailed 01/11/2006). Specifically, the Official Action asserts that "it would have been obvious to a person of ordinary skill in the art at the time the invention was made to utilize the two separate signals as taught by Lee in the liquid crystal display disclosed by Ohi et al. because this would provide a picture quality improving circuit which is capable of improving picture quality by interpolating the sampling video signal outputted from the video camera" (Id.). The Applicant respectfully disagrees and traverses the above assertions in the Official Action.

The Applicant respectfully submits that Lee may not be relied upon as a basis for rejection. MPEP § 2141.01(a) states the following:

The examiner must determine what is "analogous prior art" for the purpose of analyzing the obviousness of the subject matter at issue. "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." In re Oetiker, 977 F.2d 1443, 1446, 24 USPQ2d 1443,

1445 (Fed. Cir. 1992). See also In re Deminski, 796 F.2d 436, 230 USPQ 313 (Fed. Cir. 1986); In re Clay, 966 F.2d 656, 659, 23 USPQ2d 1058, 1060-61 (Fed. Cir. 1992).

The Official Action has not shown that Lee is in the field of applicant's endeavor or that Lee is reasonably pertinent to the particular problem with which the Applicant is concerned. First, Lee's field of endeavor is a circuit for improving picture quality by interpolation in a video camera while the field of endeavor of the claimed invention is a method of driving a display device, which is different from that of Lee. Second, although the examiner asserts that the claimed invention and Lee have the same problem, the substantial problem to be solved in the claimed invention is high power consumption due to high frequency of video signals, while the substantial problem of Lee is that complete low-pass filtering is not performed and that the signal-to-noise ratio of sampling an analog signal is not improved. As such, Lee is neither in the same field of endeavor nor concerned with the same problem as the claimed invention. Therefore, the Official Action may not rely on Lee as a basis for rejection.

Also, it is not clear why one of ordinary skill in the art who was concerned with "improving picture quality" would not have simply practiced Lee alone. Specifically, it is not clear why one would have been motivated to incorporate the decimation means of Lee into the Ohi apparatus, and it does not appear that merely inserting the decimation means of Lee into Ohi would result in improved picture quality.

Further, it is not clear that inserting the decimation means of Lee into Ohi would necessarily result in the replacement of upper H-driver 18 and lower H-driver 19 of Ohi with one source driver circuit.

Therefore, the Applicant respectfully submits that the Official Action has not provided a proper or sufficient suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Ohi and Lee or to combine reference teachings to achieve the claimed invention.

In the present application, it is respectfully submitted that the prior art of record, either alone or in combination, does not expressly or impliedly suggest the claimed

invention and the Official Action has not presented a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.

For the reasons stated above, the Official Action has not formed a proper *prima facie* case of obviousness.

Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 4 of the Official Action rejects claims 5-10 as anticipated by Ohi. The Applicant respectfully traverses the rejection because the Official Action has not established an anticipation rejection.

As stated in MPEP § 2131, to establish an anticipation rejection, each and every element as set forth in the claim must be described either expressly or inherently in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

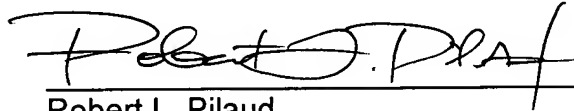
The Applicant respectfully submits that an anticipation rejection cannot be maintained against independent claims 5 and 8 of the present application. Independent claims 5 and 8 recite applying a first video signal to a source driver circuit; and applying a second video signal to the source driver circuit. The Official Action asserts that Figure 6 of Ohi teaches "applying the first video signal to a source of a driver circuit" and "applying the second video signal to a source of driver circuit" (page 9, Official Action mailed 01/11/2006; Figure 6 reproduced above). However, it is not clear how the recitation of "a source of a driver circuit" for the first and second video signals applies to the present claims, which clearly recite "a source driver circuit" for a first video signal and "the source driver circuit" for a second video signal. In other words, Ohi teaches that signals are sent to upper H-driver 18 and lower H-driver 19. However, the Official Action does not explain how Ohi teaches applying a first video signal to a source driver circuit; and applying a second video signal to the source driver circuit, either explicitly or inherently. In other words, the Official Action does not explain how Ohi teaches

applying a first video signal to a source driver circuit; and applying a second video signal to the same source driver circuit as the one to which the first video signal was applied. The Applicant respectfully submits that Ohi contains no such explicit or inherent teaching.

Since Ohi does not teach all the elements of the independent claims, either explicitly or inherently, an anticipation rejection cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert L. Pilaud", written over a horizontal line.

Robert L. Pilaud  
Reg. No. 53,470

Robinson Intellectual Property Law Office, P.C.  
PMB 955  
21010 Southbank Street  
Potomac Falls, Virginia 20165  
(571) 434-6789